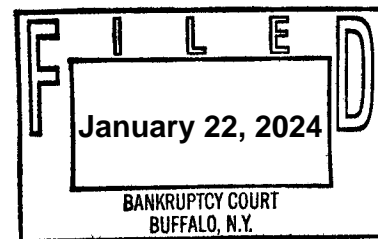


Dear Clerk of the Court,

I was informed by counsel an ex parte motion seeking to withdraw representation was filed with the Court.

As a non-attorney unfamiliar with the legal nomenclature i.e. Brief, Motion or other designation the enclosed document is an objection to motion to withdraw.

In the event you find a defect resulting in a denial of a review by Judge Bucki please inform me so I may perfect the defect or appeal the determination.

A handwritten signature in black ink, appearing to be 'JL' or similar, located below the main text.

John R. Quain/AB 741 Doe
3094 Small Canyon Dr.
Highland, Ca. 92346
Ph.805 440 4213
email

1/16/2024

Objection: Jeff Anderson and Associates Motion to withdraw representation.

I was solicited by Mr. Anderson via television advertising offering representation under New Yorks' Child Victims Act. Securing representation over twenty-five hundred miles from the Venue it's understood you are dealing with a referral law firm connected to local counsel educated in the local Rules and Customs. This not being a class action it is a reasonable expectation local counsel would have a working knowledge of the facts. The correct Venue is fundamental it also requires referring counsel keep local trail counsel apprised of the facts to effectively pursue with alacrity and diligence their shared clients' interests. Mr. Andersons business model advertising for large client volume does not negate the obligation to each individual to provide timely competent representation. The facts will demonstrate neither.

It is imperative my statement is on the Record facing the real possibility of joining the six plaintiffs already having reached their expiration dates and the glacial speed of litigation. I hope my estate can avoid this burden and I will spare the Court a litany of my ailments at seventy-five I have many and they are well documented.

There were multiple communications regarding these matters with Mr. Anderson, on a few occasions other attorneys were on the calls but the majority were telephone, texts and emails between myself and Mr. Anderson. Any characterization of our communications does not change the facts. The mention of other law firms, Lipitz and Green, was usually in the context of their actually litigating on behalf of their clients.

I appreciate this opportunity to put my statement on the Record even if the method is unorthodox.

The Facts:

The Sisters of Saint Francis of Penance and Charity are an order of nuns **independent from the Diocese of Buffalo**. The nuns doing business as Stella Niagara Edu. Park et al formerly known as Stella Niagara Cadet School are governed by the Generalate {Central Administration} Rome Italy and in *fact and law* are not part of the Dioceses of Buffalo. After agreeing to representation in a series of communications with Mr. Anderson, he was informed the Dioceses of Buffalo and Stella Niagara Education Park et al. formerly Stella Niagara Cadet School were two different entities requiring a bifurcation of torts. This information is verifiable through links on Stella Niagara's website. The dispute with counsel is based on the inclusion of Stella Niagara in the diocese's bankruptcy and failing to cite any rule or precedent explaining how an independent

non-bankrupt organization is entangled in these bankruptcy proceedings. This was brought counsels attention over a year ago.

The Sackler family/Perdue Pharma case before SCOTUS raises issues of `indemnification, amnesty for criminal conduct, liabilities and non-consenting parties and has no bearing, none on the issue of venue before this Court. The relationship of the Sackler family to Perdue is indivisible the legal relationship between Sisters of Saint Francis and the diocese is nonexistent.

After it was widely reported in the Buffalo media, "Carmelite nuns leaving Buffalo," it prompted the following statemen from the Diocese dated Oct.17, 2023 "The Diocese of Buffalo wished the nuns well, but declined to comment as the nuns are an **independent order from the diocese.**" This confirmation of the independence of the various religious Orders compelled a pro se filing found to be procedurally deficient by the Courts clerk.

Non-pecuniary Demands:

I have reason to believe records maintained by the nuns contain false statements designed to preemptively discredit me in the event the assault by the priest Ormsby came to light. This is not idle speculation there were specific actions taken to protect the reputation of the school at a grave cost to me. As a young cadet it was drilled in our heads some day you may apply for one of the military academies or government employment and they will ask us for your records. It is my intent to offer the nuns an opportunity to correct the record and address other delicate matters of concern. As a septuagenarian non-public person, I understand it's unlikely this information would ever enter the public domain but the point is in a court of law the truth still matters. The look back law instigated reflection on a chaotic and cruel childhood. After many years of turmoil, I obtained a fulfilling life yet I still find this so disturbing and intrusive. The tranquility of my retirement has been forever altered.

My Statement:

It was Sister Beatrice {locum parentis} who introduced me to Monsignor Basil Ormsby who was visiting his brother Major Louis J. Ormsby ret. the commandant of the boy's military academy. It was in the fall I was an eight-grader. We were not in class that day, I was taken off campus and assaulted by the priest. In retrospect as grotesque as the priest's conduct was it was Sister Beatrice who did the lasting damage. Some weeks after the assault while eating breakfast sister Beatrice came in to the boy's cafeteria and ordered me into the adjacent scullery. Once alone raging inches from my face "this dirty boy sex talk stops now, I didn't even know what it was someone had to tell me." She said, I told some of my classmates about the assault by the priest and someone had told her. She then said "I'll deal with you later" putting her finger in my face she said," it stops now" and with a look of disgust proclaimed "you're a pervert!" Wise mouth teenager that I was I replied "if I'm a pervert what's monsignor" and before I could complete the name Ormsby she backhanded me across the mouth. My recollection is quite vivid, a year earlier while sledding on the playground I ran into a steel support post from a swing set breaking my two front buck teeth leaving jagged edges and this was my first experience with

poetic justice or instant karma when Sister Beatrice pulled her hand away from my mouth her knuckles were gushing blood. That moment still inspires schadenfreude, she wrapped a dish towel around her hand and left. That was the first time I heard the word pervert. That was also first and only time I was ever backhanded to my face, then months of punishments followed for any infractions real or imagined with some lasting effects to this day. I observed nuns engage in masochistic prayer rituals and know firsthand people capable of inflicting pain on themselves have little problem dispensing it on others to either beat the devil out them or atoning for thier sins as justification it hurts the same.

Generational Damage:

While home on Christmas break that year I never mentioned any of the events, the assault by the priest, the assault by the nun or the increased punishments. After Christmas diner the family was sitting at the dining room table having coffee and talking my father left the room and returned shortly with a number of folders, he passed one to each of my siblings he then reviewed the stocks he bought and managed for them when finished he collected the folders and went to the den. I followed, once inside I asked "why no stocks for me" he said "they told me you're a pervert" and left the room. I was guilty of the unforgivable my successful conservative catholic father was humiliated and embarrassed I was branded a pervert the breach was final and irrevocable. My father not only new the Ormsby family he employed yet another Ormsby brother as a salesman in one of his companies. I knew by then any mention of the degenerate priest would not help my situation and my father was capable of violence. A year and half later I found myself a remittance man, in the pejorative sense, paid to attend school in Mexico City far from home it did not end well after dropping out of tenth grade I was pretty much abandoned there. In this time period being label a pervert was not only morally unacceptable it was considered criminal or a mental disorder the solution then and unfortunately for far too many kids today suicide. Having been silent for sixty tears if nothing else establishing this record has proven to be cathartic.

Findings:

Although these are two separate organizations their reactions to Monsignor Ormsby's depravity were the same protect the institutions at all costs no matter the collateral damage. In this case the cliché is true the cover up was worse than the crime. I have no expectation of being made whole but I do expect these organizations to acknowledge the damage they have done and some recompense is due.

The matter does not impact the efficiency of the Court the facts are disparate from the Committee negotiating with dioceses concerning priests and their pastoral duties. This is an independent organization; the priest was not present in any official capacity I was a target of opportunity. Stella Niagara was responsible for the subsequent cruelties imposed on me and the lasting damage.

Mr. Andersons' letter dated Dec.22 requesting to withdraw representation fails to address the relevant issue venue.

Motion:

The Court order Jeff Anderson and Assoc. to complete the process required for a stipulated finding of Stella Niagara et al as independent of the Dioceses of Buffalo N.Y. allowing me to proceed in the proper venue. I am experienced enough to know my tenth-grade education and autodidactic talents are insufficient to navigate the byzantine legalities and pitfalls awaiting the unsuspecting layperson. Once Stella Niagara is free from this bankruptcy mishigas I will retain local counsel to represent in the various proceedings. Allowing counsel to abrogate its obligations without resolution of the issue would prejudice the interests of his client and handicap his ability retain new counsel. The Court has awesome power and too paraphrase Henry the 11 who will rid me of this turbulent client I pray the Court not be the instrument of execution. It is regrettable that counsel now wishes to make his abandonment official and extricate themselves from a problem of their own making while attempting to deflect responsibility and place blame on their client.


John R. Quain